

# Symrise Anti-Bribery & Anti-Corruption Policy

## "Any business that cannot be reconciled with our fundamental principles is no business for Symrise."

Symrise wants to increase the value and sustainability of its business activities over the long term. Fundamental in the work of sustainable development is the prevention of corruption which is not only a relevant issue on governmental level and in the global economy but has also an explicit link between combating corruption and achieving SDG 16: peaceful, just and inclusive societies and which is more over vital for the achievement of all the 17 SDGs.

## Scope of this policy

This policy applies to every employee at Symrise AG. It applies during working hours and it should also be followed when involved in external activities as an employee or representative of Symrise. A violation of this policy or other regulations and guidelines can lead to disciplinary measures and other legal actions.

#### Zero-Tolerance:

Legal compliance and ethical behaviour is an essential foundation of our business relationships. Compliance with international treaties and standards is mandatory.

We do not tolerate any form of corruption at Symrise. Accepting or providing money or services of any kind in an attempt to obtain a competitive advantage is prohibited.

Bribery and money laundering are criminal offenses that we strongly condemn. Our principle is clear and thus applies to employees in all countries.

## **Symrise Code of Conduct**

Our principles for combating corruption are laid out in our Code of Conduct, which acts as a binding model for all employees. It applies to all countries regardless of possible conflicting cultural customs, regulates behaviour with key Symrise partners and ensures transparent and reliable processes:

- No gifts and/or other personal favors may be expected or provided in return for business relationships. This holds true even when "cultural custom" seem to demand it.
- We do not expect any personal favors from our business partners and refuse all offers of this kind. This applies equally to all employees at every level of our company.
- We never provide financial contributions of any kind to government officials or public servants, even if they should request them.
- We do not provide government officials of any kind or public servants with cash or noncash contributions, not even when these are requested.
- We do not involve ourselves in any form of money transfer whose origin or destination could be tied to money laundering and or criminal activities.
- We are certain of the identity of our business partners when it comes to transactions. We only accept money from and/or pay money to business partners whose identity we are certain of.

In the interest of all employees and the company, we react swiftly to violations against the Code of Conduct and rectify their cases (see Governance and Grievance mechanisms).

Our expectations to suppliers and business partners related to business ethics, anti-corruption and anti-bribery is laid out in detail in our "Responsible Sourcing and Supplier Code of Conduct".



#### **Laws and Regulations**

Symrise is committed to complying with all applicable anti-bribery and anti-corruption laws that apply to its business activities around the world, including but not limited to, the U.S. Foreign Corrupt Practices Act ("FCPA"), and U.K. Bribery Act and other anti-bribery and anti-corruption laws which may apply in relevant jurisdictions.

Every Symrise group company must also comply with national laws when implementing this policy. In certain countries, it is possible that stricter or more comprehensive laws or regulations may apply than those described in this policy. In such cases, the stricter regulations always apply.

## **Communication and Training**

All employees are required to know the basic laws, regulations and internal corporate results that apply to their areas of responsibility. Additionally, every manager needs to ensure that their staff are familiar with the policy and that they work in compliance with its provisions. This is a mandatory requirement.

In order to ensure compliance with all compliance requirements on an ongoing basis, the need for training is regularly identified and suitable training courses are held.

All employees take part in rolling training courses based on predefined schedules. Depending on whether they are basic, refresher or specialized training courses, these schedules cover a period of between one and three years. Training is offered as presence on-site but also internet-based courses. Subsequent tests confirm not only that a training course has been completed but that its content has been understood.

New to Symrise employees are given comprehensive training on the fundamental principles of our Code of Conduct.

# Supply Chain and Business partners:

We expect our suppliers and business partners to comply with all anti-bribery and anti-corruption laws and with various global and country standards as laid out among others in our "Responsible Sourcing and Supplier Code of Conduct".

Symrise reserves the right to audit suppliers using members of our trained, experienced internal staff or third-party independent reviewers. There may be announced or unannounced site visits, self-assessment surveys, requests for documentation and other analytic instruments used. We fully respect and appreciate our suppliers' sincere efforts to correct deviations in an appropriate timeframe. However, if standards are not met after such attempts, or if there is an unwillingness to comply, the business relationship may be terminated as a last resort.

## Governance & Grievance mechanisms (whistle-blowing):

The Executive Board is committed to supporting the implementation of this policy and programs and has assigned senior managers to implement the programme.

## Symrise operations

The **Group Compliance Officer** is responsible for monitoring observance of the Symrise Code of Conduct and the applicable legal regulations as well as for developing, implementing and adhering to the Symrise compliance program reporting regularly on status to the CFO, member of the Executive Committee.

To guard against any breach in legal and ethical standards, an Integrity Hotline has been installed. This ensures that all Symrise employees at any Symrise location around the world can anonymously report breaches in legal regulations and internal company guidelines.

By means of this hotline, all our employees are able to contact the **Group Compliance Office** using toll-free telephone numbers that have been specially set up in the individual countries. Of course, reports are treated confidentially, and whistle-blowers are not prosecuted. We consistently pursue misconduct within the scope of the applicable national legislation.

Symrise performs regular and ad hoc audits of all sites to identify any cases of corruption.



## Supply Chains & Business partners:

The **Symrise Compliance Officer Sustainability** is the designated person to be contacted directly by third party whistle-blowers in case of problems on ethical and other sustainability related issues at Sustainability.office@symrise. He reports to the Chief Sustainability Officer who is also Chair of the Symrise Sustainability Board and a direct report to the CEO.

The **Symrise Compliance Officer Sustainability** is also a member of the Responsible Sourcing Steering Committee (RSSC) that reports regularly to the Supply chain managers of the segments "Scent & Care" and "Taste, Nutrition & Health" and the Symrise Sustainability Board on identified ESG issues and on improvement measures taken.

## **Compliance and Reporting**

We transparently report annually in our Sustainability Record (GRI Report) on sustainability issues with reference to Anti Corruption and Anti Bribery identified.

# Related policy:

Political Involvement Policy

Holzminden, 11. April 2022

Dr. Heinz-Jürgen Bertram

CEO and President Scent & Care

Dr. Jean-Yves Parisot

President Taste, Nutrition & Health

Olaf Klinger

Chief Financial Officer